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 FOR MEDICAL PROGRESS, BIOMAX
 PROCUREMENT SERVICES, LLC, DAVID
 DALEIDEN, AND TROY NEWMAN*

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

| | | |
|---------------------------------|---|----------------------------------|
| NATIONAL ABORTION FEDERATION |) | CASE NO.: 3:15-cv-03522-WHO |
| (NAF) |) | |
| |) | Judge William H. Orrick, III |
| Plaintiffs, |) | |
| vs. |) | JOINT STIPULATION AND [PROPOSED] |
| |) | ORDER REGARDING EXTENDING |
| THE CENTER FOR MEDICAL |) | TEMPORARY RESTRAINING ORDER; |
| PROGRESS, BIOMAX PROCUREMENT |) | EXTENDING SCHEDULING ORDER |
| SERVICES, LLC, DAVID DALEIDEN |) | REGARDING DISCOVERY AND |
| (aka "ROBERT SARKIS"), and TROY |) | PRELIMINARY INJUNCTION; AND |
| NEWMAN |) | EXTENDING DEADLINE TO ANSWER |
| Defendants. |) | COMPLAINT |
| |) | |

Pursuant to Civil L.R. 6-2, Plaintiff National Abortion Federation (NAF) and Defendants
 The Center for Medical Progress, Biomax Procurement Services LLC, David Daleiden (aka
 "Robert Sarkis"), and Troy Newman ("Defendants") file this stipulation regarding extending the

1 briefing and hearing schedule on NAF's preliminary injunction motion, and concurrently
2 extending the temporary restraining order through the date of the Court's final disposition on
3 NAF's preliminary injunction motion.

4 WHEREAS, on July 31, 2015, NAF filed the Complaint and moved for a temporary restraining
5 order, order to show cause, preliminary injunction motion, and motion for expedited discovery
6 (Docket Nos. 1, 3, 5);

7 WHEREAS, on the same day, the Court granted a temporary restraining order and order to show
8 cause, setting a hearing for August 3, 2015 (Docket No. 15);

9 WHEREAS, on August 3, 2015, the Court extended the temporary restraining order to remain in
10 effect pending resolution of NAF's preliminary injunction motion, granted NAF's motion for
11 expedited discovery, and set a briefing and hearing schedule (Docket No. 26, 27);

12 WHEREAS, the parties met and conferred regarding NAF's discovery requests and the
13 current scheduling order;

14 WHEREAS, the Court and the parties would benefit from an extension of the current
15 schedule to accommodate conflicts in the calendars of the witnesses subject to deposition
16 notices, to accommodate travel schedules for certain counsel of record, and to allow the parties
17 more time to engage in discovery and prepare papers in connection with NAF's preliminary
18 injunction motion;

19 WHEREAS, both parties are amenable to extending the Court's temporary restraining
20 order to remain in effect through the Court's final disposition on NAF's preliminary injunction
21 motion;

22 WHEREAS, the parties' agreed that Defendants' deadline for responding to the
23 Complaint be extended until 21 days after the Court's final disposition on NAF's preliminary
24 injunction motion;

25 WHEREAS, there have been no previous time modifications in this case;

26 NOW THEREFORE, IT IS HEREBY STIPULATED and agreed to by and between the
27 parties, subject to the approval of the Court, that:

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1 1. The Court's temporary restraining order (Docket No. 15, 27) shall remain in
2 effect through the Court's final disposition on NAF's preliminary injunction motion; and

3 2. The following deadlines shall apply:

| | |
|---|---|
| 4 Thursday, August 20 | Deadline for the parties to submit a joint discovery letter 5 concerning any discovery disputes relating to Plaintiff's 6 motion for a preliminary injunction that they are unable to 7 resolve. |
| 8 Friday, August 21 at 4:00 pm | Hearing on any disagreements concerning discovery if a 9 joint discovery letter was previously filed by the parties. |
| 10 Friday, September 4 | Deadline for conducting discovery relating to Plaintiff's 11 motion for a preliminary injunction. |
| 12 Wednesday, September 16 | Deadline for Plaintiff's submission of a brief in support of its 13 motion for a preliminary injunction. |
| 14 Monday, September 28 | Deadline for Defendants' submission of a brief opposing the 15 motion. |
| 16 Monday, October 5 | Deadline for Plaintiff's submission of a reply brief in support 17 of the motion. |
| 18 Thursday, October 8, at 4:00 19 pm | Hearing on the motion. |
| 20 21 days after the Court's final 21 disposition on NAF's 22 preliminary injunction motion | Defendants' deadline to respond to the Complaint. |

23
24 3. The deadlines set in the existing Order Setting Initial Case Management Conference and
25 ADR Deadlines (Aug. 3, 2015) (Docket No. 19) be vacated, to be reset after Defendants file their
26 response to the Complaint.

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IT IS SO STIPULATED.

Dated August 6, 2015.

Respectfully submitted,

/s/ Derek F. Foran

/s/ Brian R. Chavez-Ochoa

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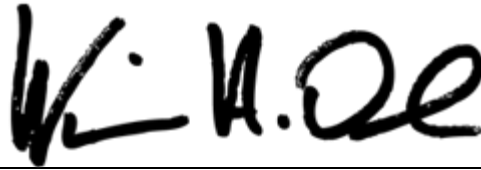
ORDER

Based on the foregoing stipulation,

IT IS SO ORDERED, as modified below:

1. The deadline to submit the joint discovery letter is Wednesday, August 19, 2015.
2. The hearing on any discovery disagreement will be on Friday, August 21, 2015 at 10:00 a.m.
3. The hearing on plaintiff's motion for preliminary injunction is set for 3:00 p.m. on Friday, October 9, 2015.

With those exceptions, all other terms and conditions of the parties' Joint Stipulation are approved and adopted without modification.



Dated: August 6, 2015

The Honorable Judge William H. Orrick
United States District Judge